## **REMARKS**

Claims 1, 9-11, 14, 16 and 17 are pending in this application.

OCT 3 1 2006

By this Amendment, claims 1, 14 and 17 are amended to recite additional features disclosed in the specification at, for example, Fig. 4.

Reconsideration of the application is respectfully requested.

The Examiner is respectfully requested to contact the undersigned for a personal interview before issuing another rejection, if any. In this regard, Applicant submits the enclosed Form PTOL-413A to request such a personal interview.

The Office Action rejects claims 1, 9, 11, 14, 16 and 17 under 35 U.S.C. §102(b) over U.S. Patent No. 6,452,653 to Yamanaka et al. ("Yamanaka-I"); and rejects claim 10 under 35 U.S.C. §103(a) over Yamanaka-I in view of U.S. Patent No. 6,873,384 to Yamanaka et al. ("Yamanaka-II"). These rejections are respectfully traversed.

Yamanaka-I discloses groups of columns 12 having column portions 13. See Fig. 1 and col. 18, lines 28-57. The Office Action asserts that Figs. 23B and 24B of Yamanaka-I disclose square or rectangular patterns containing randomly distributed groups 12. However, Yamanaka-I's groups 12 and the asserted "patterns" are not associated with a pixel in this portion of Yamanaka-I's disclosure. The Office Action appears to be picking different features from different embodiments of Yamanaka-I, while Yamanaka-I does not disclose combining the asserted features among the different embodiments.

For example, at col. 34, line 24, Yamanaka-I specifically states that the plural groups 12 of Fig. 24 are an alternative to the plural groups 12 of Fig. 23. Yamanaka-I does not disclose that the plural groups 12 of Figs. 23, 24 are used together. Thus, Yamanaka-I does not disclose an irregular surface that includes different types of irregularity groups.

The Office Action further asserts that in an embodiment shown in Fig. 28, Yamanaka-I discloses pixels 102, each having a projection 103. Such an assertion is, again, picking different features from different embodiments of Yamanaka-I. The features disclosed

in Figs. 23B and 24B are directed to embodiments having groups 12, as shown in Fig. 1. See col. 34, lines 14-28. Yamanaka-I does not disclose that the features shown in Figs. 23B and 24B are associated with the embodiment shown in Fig. 28. For example, the embodiment shown in Fig. 28 of Yamanaka-I does not disclose groups having substantially randomly arranged irregularities.

Fig. 28 of Yamanaka-I shows a platen used to fabricate a reflector. The platen includes regions 102, which correspond to pixels. More specifically, as shown in Figs. 29A to 29C, the projections 103 are for forming contact holes 110 and holes 104 will form spacers 111. The Office Action appears to be implying that the four regions 102 correspond to two sections in Fig 23B and the four sections of Fig. 24B. However, there is no description in Yamanaka-I that relates the configuration of Fig. 28 with those of Figs. 23B, 24B.

Further, the groups 12 are arranged in Fig. 23B so that the light reflecting thin film inclines toward the demarcation line P, which halves the screen into upper and lower parts and the groups 12 are arranged in Fig. 24B so that the light reflecting thin film inclines toward a center portion of the screen. (See col. 34, lines 19-28.) That is, if the configuration of Fig. 28 were to correspond to those of Figs. 23B, 24B, then the entire display screen would have only four pixels, which would be nonsensical.

Moreover, even assuming for the sake of argument that, in Yamanaka-I, the plural groups 12 of both Figs. 23, 24 were used in the same display and that the four regions 102 correspond to the sections of Figs. 23B, 24B, the resultant display would have irregularity groups having a length and width that are the same as or <u>larger</u> than those of the pixels. There would be no different irregularity groups each having a length that is <u>shorter</u> than the length or width of the pixels and a width that is <u>shorter</u> than the length or width of the pixels as recited in claim 1, and similarly recited in claims 14 and 17.

It is noted that the depressed portions 101 of Yamanaka-I's Fig. 28 do not correspond to the irregularity groups recited in the claims, because there is only one type in each region 102. Also, the depressed portions 101 are not randomly arranged.

For at least the above reasons, Yamanaka-I does not disclose or suggest the subject matter recited in the claims. Also, Yamanaka-II does not supply the subject matter lacking in Yamanaka-I. Thus, Yamanaka-I and Yamanaka-II, either individually or in combination, do not disclose or suggest the subject matter recited in claims 1, 14 and 17, and claims 9-11 and 16 depending therefrom. Accordingly, withdrawal of the rejection of claims 1, 9-11, 14, 16 and 17 under 35 U.S.C. §102(b) and §103(a) is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 9-11, 14, 16 and 17 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

James A. Oliff

Registration No. 27,075

Gang Luo

Registration No. 50,559

JAO:GXL/sqb Attachment:

Form PTOL-413A

Date: October 31, 2006

OLIFF & BERRIDGE, PLC P.O. Box 19928 Alexandria, Virginia 22320 Telephone: (703) 836-6400 DEPOSIT ACCOUNT USE
AUTHORIZATION
Please grant any extension
necessary for entry;
Charge any fee due to our
Deposit Account No. 15-0461